

STEPHEN DREW DELOACH

Plaintiff,

Vs.

RACHEL ELIZABETH SAVIN

Defendant.

} IN THE CIRCUIT COURT

} OF LEE COUNTY, AL

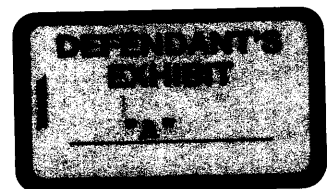
} CASE NO: CV-2005-339

FILED
MAY 24 2005

IN OFFICE
CORINNE T. HURST
CIRCUIT CLERK

COMPLAINT

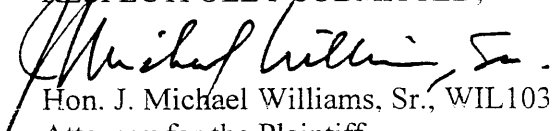
1. On or about the 17th day of October, 2003 at approximately 5:40 a.m., upon a public highway, being Lee Road 379, the Defendant negligently and wantonly caused or allowed her motor vehicle to collide with the motor vehicle owned and operated by the Plaintiff.
2. As ~~a~~proximate result of the Defendant's said negligence and wantonness, the Plaintiff was caused to suffer the following damages and injuries:
 - A. He was bumped and bruised in general. He also suffered a lower back injury which resulted in disc surgery at East Alabama Medical Center, as performed by Dr. Frazier Jones of the Orthopedic Clinic.
 - B. The Plaintiff has incurred expenses for medicine, physician expenses, hospital charges, and pharmaceutical charges.
 - C. The Plaintiff was caused to loose wages and income.
 - D. The Plaintiff has experienced pain and suffering as well as mental aguish and emotional distress.
 - E. The Plaintiff may have some permanent disability.
3. The Plaintiff claims punitive damages, due to the Defendant's said wanton conduct, which includes the fact that she was exceeding a safe speed limit when approaching the intersection of Lee Road 158 and Lee Road 379, to

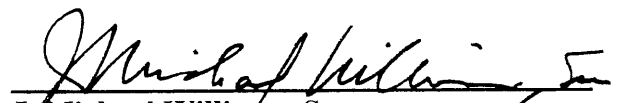


such a degree that she ran the stop sign and caused the collision with the Plaintiff's vehicle.

Wherefore, the Plaintiff demands judgment against the Defendant in a sum in excess \$10,000 and costs.

RESPECTFULLY SUBMITTED,


Hon. J. Michael Williams, Sr., WIL103
Attorney for the Plaintiff
P. O. Box 1068
Auburn, Al 36831-1068/334-705-0200


J. Michael Williams, Sr.

Plaintiff demands a jury trial on all issues.

Plaintiff request service by Certified on the Defendant at 510 Averwater Court, Franklin, Tennessee, 37067

Interrogatories and request for Production of documents are served with the Summons & Complaint

RECEIVED

JUN 06 2005

CIVIL SUMMONS
CASE NUMBER: CV-2005- 339PROGRESSIVE CLAIMS
BIRMINGHAM, AL

IN THE CIRCUIT COURT OF LEE COUNTY

Plaintiff: STEPHEN DREW DELOACH vs. Defendants: RACHEL ELIZABETH SAVIN.

NOTICE TO: Rachel Elizabeth Savin, 510 Averwater Court, Franklin, Tennessee, 37067:
 THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF OR PLAINTIFF'S ATTORNEY: J. MICHAEL WILLIAMS, SR. AT THE ADDRESS OF P.O. BOX 1068, AUBURN, AL 36831-1068.

THIS ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSON AUTHORIZED by the Alabama Rules of Civil Procedure:

_____ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant.

☒ Service by certified mail of this summons is initiated upon the written request of Plaintiff pursuant to the Alabama Rules of Civil Procedure.

Date 5-24-05 Conrad T. Ubert By: JP
Clerk/Register

☒ Certified Mail is hereby requested.

J. Michael Williams, Sr.
Plaintiff's Attorney's Signature

RETURN ON SERVICE:

_____ Return receipt of certified mail received in this office on _____
(Date)

_____ I certify that I personally delivered a copy of the Summons And Complaint to _____
_____ in _____, County, Alabama on _____
(Date)

Date

Server's Signature

Address of Server

Type of Process Server